

10428

November 30, 2001

Mike Light  
Project Coordinator  
Solutia Inc.  
575 Maryville Centre Drive  
St. Louis, Missouri 63141

Re: Sauget Sites Area 1 - May 31, 2000 Unilateral Administrative Order (UAO)  
Sediment / Soils Removal Action  
Post Removal Sampling Requirements

Dear Mr. Light,

After reviewing your August 20, 2001 request to reduce the sampling frequency within the creek segments, the U.S. EPA offers the following.

Both the U.S. EPA and the Illinois EPA agree that the total number of samples as outlined in the UAO appears to be excessive and that some relief is warranted. Solutia must remember however, that the intent of any post removal sampling is to verify sediment removal and then use those results to make both economical and environmental decisions.

Revised Post Removal Sampling Plan

- 1) Creek Segment - B (1800')
  - Composite of 3 sample locations into 1 sample for laboratory analysis. (No PID)
  - Transect each 100 feet for a total of approximately 18 samples (as detailed in the UAO)
  - Broad scan analysis for each sample location (as detailed in UAO)
- 2) Creek Segment - C (1300')
  - Composite of 3 sample locations into 1 sample for laboratory analysis. (No PID)
  - Transect each 150 feet for a total of approximately 9 samples (different than UAO)
  - Broad scan analysis for each sample location (as detailed in UAO)
- 3) Creek Segment - D (1100')
  - Composite of 3 sample locations into 1 sample for laboratory analysis. (No PID)
  - Transect each 200 feet for a total of approximately 6 samples (different than UAO)
  - Broad scan analysis for each sample location (as detailed in UAO)

- 4) Creek Segment - E (4300')
  - Composite of 3 sample locations into 1 sample for laboratory analysis. (No PID)
  - Transect each 250 feet for a total of approximately 17 samples (different than UAO)
  - Broad scan analysis for each sample location (as detailed in UAO)
- 5) Creek Segment - F (6500')
  - Composite of 3 sample locations into 1 sample for laboratory analysis. (No PID)
  - Transect each 400 feet for a total of approximately 16 samples (different than UAO)
  - Broad scan analysis for each sample location (as detailed in UAO)

From the above outline, the post removal sampling requirements will be reduced from 255 to 66. Since there appears to me to be no compelling reason, the analyte list will remain unchanged from the UAO (.....extracted using TCLP and analyzed for Total Compound List/Total Analyte List (TCL/TAL) parameter and dioxin/furans). This change will result in a savings (using your numbers) of over \$935K.

If there are any questions about the above, please call me at (618) 997-0115.

Sincerely,

Kevin Turner  
U.S. EPA

cc: Mike Ribordy - USEPA  
Sandy Bron - Illinois EPA

bcc:

Bruce Yare - 1S

Steve Smith - 1S

Linda Tape, Esq. - Thompson Coburn

Brent Gilhousen - 3S